

# **Exhibit 93-B**

**Redacted Version of  
Document Sought to be Sealed**



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## Memorandum

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**TO:** Gibson, Dunn & Crutcher LLP  
**FROM:** FTI Consulting, Inc.  
**DATE:** March 6, 2020  
**RE:** Recommendation & Analysis of RFI Response – Zynga  
**PRIORITY:** Standard

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*This memorandum provides a developer-level RFI response analysis and disposition of Zynga's RFI response. This app developer was prioritized for investigation via the "Wave 2" Top Developer Risk-Based Category efforts and was prioritized for investigation due to the significant number of apps on the Facebook platform with over 100,000 users. FTI may supplement this analysis and update the recommendations if additional information becomes available.*

### **Recommendation**

FTI's background investigative research of the developer Zynga Inc. ("Zynga") included a review of Zynga's Top 500 apps<sup>1</sup> and Top 20 apps. Zynga was flagged for investigation as the company was found to be the developer of a significant number of apps with over 100,000 users.

Zynga is publicly-traded in the US and is a San Francisco, California-based app developer of social games. The company has produced some of the most popular mobile and Facebook apps, most notably FarmVille, which was launched in 2009 and was Facebook's most popular game for two years, as well as CityVille, Words with Friends, and Zynga Poker. Zynga currently lists over 40 games on its website and the company has frequently been described in media outlets including the Wall Street Journal and Bloomberg as a social gaming "pioneer" and has multiple offices worldwide.

The ADI team completed technical reviews for the top 20 Zynga apps based on risk prioritization score ("RPS"). Of note, the ADI Team determined that 19 of 20 apps held 31 permissions to sensitive data for 10 or more users and therefore recommended a Request for Information ("RFI") be sent to Zynga.

The ADI Team identified 44,386 total apps associated with Zynga.<sup>2</sup> The majority, over 70% of the apps, have been deleted by Facebook while over 10% have been deleted by the Developer. Of the Top 500 apps developed by Zynga, there were 1,009,002,324 distinct users that ever installed one or more of the

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<sup>1</sup> Top 500 apps are based on a risk prioritization methodology developed by FTI and Stroz Friedberg

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apps. In aggregate, the Top 500 apps could have accessed approximately 200 million users' and their friends' photos, videos, about me, activities, education history, events, groups, interests, likes, notes, relationship details, religion/politics, status, work history, and all content from user-administered groups. Respondent noted that their "policy is to delete and/or anonymize all data, including Facebook data, for all apps as part of our normal game sunset process. The data anonymization removes all PII and external IDs and only leaves behind data that cannot be tied back to Facebook accounts. This process has been completed for all games sunset prior to 2019." (See Question #5)

Zynga has **not provided a signed and certified response** to Facebook's RFI and the initial RFI is incomplete. In response to the RFI, Zynga provided an Excel file containing a list of 292 apps where only 44 apps are listed as active. Two questions (#4 and #7) were initially left unanswered and responses are pending. The ADI Team, through a follow up, requested for the RFI to be completed and the Developer has generally been cooperative. The developer provided a response to Question #4. To date, Question #7 has not been answered. Question #7 asks: *"Identify companies, including tech and service providers, with whom you partner for app development. Describe the nature of these partnerships and who stores the data obtained from Facebook. Do you maintain service level agreements with these partners that address the collection and storage of data obtained from Facebook? If so, please provide copies of those agreements."*

The RFI response also states that Zynga is not aware of any data collected from Facebook to have been sold, licensed, or monetized by Zynga or its partners.

The investigative team found that in January 2019, multiple children's advocacy groups submitted a complaint to the Federal Trade Commission seeking an investigation into "whether Facebook violated consumer protection and child privacy laws by duping children into making in-app purchases in games like Angry Birds, PetVille, and Ninja Saga, then making it nearly impossible for children or their parents to seek refunds."<sup>3</sup> The complaint was prompted by the unsealing of documents from a 2012 lawsuit filed against Facebook by parents whose children had spent hundreds of dollars on in-app purchases.<sup>4</sup> Internal Facebook documents, which referred to the effort as "friendly fraud," noted that the issue "seemed especially bad" with certain games, specifically naming PetVille.<sup>5</sup>

In 2018, after Cambridge Analytica's data misuse was revealed, media reported that thousands of app developers, "including makers of games such as FarmVille...also siphoned huge amounts of data about users and their friends, developing deep understandings of people's relationships and preferences."<sup>6</sup> Other media reports stated that FarmVille "helped users become comfortable with giving away their

<sup>3</sup> <https://www.nytimes.com/2019/02/21/technology/facebook-children-privacy.html>

<sup>4</sup> <https://www.revealnews.org/article/facebook-knowingly-duped-game-playing-kids-and-their-parents-out-of-money/>

<sup>5</sup> Ibid.

<sup>6</sup> [https://www.syracuse.com/us-news/2018/03/facebook\\_data-mining\\_cambridge\\_analytica\\_farmville\\_obama.html](https://www.syracuse.com/us-news/2018/03/facebook_data-mining_cambridge_analytica_farmville_obama.html)

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Facebook data”<sup>7</sup> and that games like FarmVille helped players “get very used to using apps on Facebook with this expectation that it was harmless essentially.”<sup>8</sup>

The RFI response does not directly address any specific permissions and/or data collected by Zynga or the apps as the information is not available. The ADI Team notes that the respondent listed less than 300 apps whereas the ADI Team believes there are more than 40,000 apps. Further, the ADI Team believes more information regarding permissions is necessary, as approximately 200 million users’ and their friends’ photos, videos, about me, activities, education history, events, groups, interests, likes, notes, relationship details, religion/politics, status, work history, and all content from user-administered groups.

Zynga’s response did not fully alleviate potential areas of concern raised by the ADI Team in their September 7, 2019 RFI response. As the RFI response was neither signed nor certified, Question #7 remains unanswered and many of the answers provided did not explicitly answer the questions asked, FTI recommends holding a discussion with the developer and/or sending a follow-up RFI to address the questions below. Additionally, FTI recommends counsel consider consulting with the client regarding Zynga’s practices of retaining anonymized Facebook user data following deactivation of its apps.

**Suggested Follow-up Questions:**

1. Thank you for your RFI response. Please sign and certify the responses you previously provided.
2. Please see below for a list of some of the apps created by Zynga and, regarding each of the below-listed apps, please respond to the following questions:
  - a. What are the functions of this app?
  - b. Is this app associated with any other companies? If so, please identify the companies associated with each app.
  - c. To the best of your knowledge, has this app been sold or transferred to another party?
  - d. Do you continue to manage this app?
  - e. For apps that are deleted or no longer active, has all data associated with them been deleted? If not, why not?
  - f. For apps that are active, has all data that is not used to meaningfully improve the users experience within the app been deleted (e.g., friend data)? If not, why not?

<i><b>App Name</b></i>	<i><b>App ID</b></i>
FishVille	151044809337

<sup>7</sup> <https://slate.com/technology/2018/03/farmville-helped-sow-the-seeds-of-the-cambridge-analytica-scandal.html>

<sup>8</sup> Ibid.

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YoWorld	21526880407
PetVille	163576248142
Treasure Isle	234860566661
Friends For Sale!	7019261521
Roller Coaster Kingdom	89771452035
Zynga Game Bar	177554951839
Vampire Wars	25287267406
Mafia Wars 2	121581087940710
Street Racing	32375531555
FrontierVille	201278444497
Fashion Wars	39183588571
Pirates: Rule the Caribbean!	16421175101
Pirates: Rule the Caribbean!	6921127772

3. Thank you for your response to RFI Question #2. We understand a full history of permissions collected is not available; however, to the best of your ability, please provide a list of permissions requested before May 2015, including all user and friends' permissions for the apps listed below.

<b>App Name</b>	<b>App ID</b>
FarmVille	102452128776
Texas HoldEm Poker	2389801228
Mafia Wars	10979261223
Café World	101539264719
Pioneer Trail	266989143414
Scramble	6494671374

4. Thank you for your response to RFI Question #3. We understand a full history of fql queries and gr:get:multi methods may not be available. Please provide all documentation associated with the app's connection to Facebook's API and collection of data prior to May 2015.

<b>App Name</b>	<b>App ID</b>
FarmVille	102452128776
Texas HoldEm Poker	2389801228
Mafia Wars	10979261223
Café World	101539264719
Pioneer Trail	266989143414
Scramble	6494671374

5. Please provide a response to Question #7: "Identify companies, including tech and service providers, with whom you partner for app development. Describe the nature of these partnerships and who stores the data obtained from Facebook. Do you maintain service level

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*agreements with these partners that address the collection and storage of data obtained from Facebook? If so, please provide copies of those agreements.”*

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### Itemized Analysis

FTI highlighted noteworthy RFI responses in the table below along with observations, analyses, and possible follow-up questions.<sup>9</sup>

Question 1:	
<b>Question Text:</b>	<p>Identify all apps currently or previously associated with Zynga, including any deleted apps. For each application, please explain:</p> <ol style="list-style-type: none"> <li>What are the functions of this app?</li> <li>Is this app associated with any other companies? If so, please identify the companies associated with each app.</li> <li>To the best of your knowledge, has this app been sold or transferred to another party?</li> <li>Do you continue to manage this app?</li> <li>For apps that are deleted or no longer active, has all associated data with them been deleted? If not, why not?</li> <li>For apps that are active, has all data that is not used to meaningfully improve the users experience within the app been deleted (e.g., friend data)? If not, why not?</li> </ol>
<b>Response:</b>	<p><i>Please refer to the respondent's answers for the apps provided by the respondent. A summary of the response can be found below:</i></p> <p>The respondent provided an Excel file containing a list of 292 Apps.</p> <p>A. Functions of the Apps:</p> <ul style="list-style-type: none"> <li>145 Apps are identified as "Entertainment" for their function</li> <li>147 Apps are identified as "Staging/Dev" for their function</li> <li>44 Apps are listed as Active, where 3 are in Staging/Dev</li> </ul> <p>B. Company associations of Apps:</p> <ul style="list-style-type: none"> <li>3 Apps were acquired from Boss Alien</li> <li>7 Apps were acquired from Harpan LLC</li> <li>1 App was acquired from omgpop</li> <li>11 Apps were acquired from Peak Games</li> <li>1 App was acquired from Rising Tide</li> <li>1 App is associated to MunkyFun</li> </ul>

<sup>9</sup> Prior to submission, all follow-up questions and requests must first be reviewed and approved by Gibson Dunn, as well as the appropriate parties at Facebook.

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	<ul style="list-style-type: none"> <li>• 1 app was acquired from The Walt Disney Company</li> <li>• 1 app is associated to The Walt Disney Company</li> </ul> <p>C. Sale or transfer to another party?</p> <ul style="list-style-type: none"> <li>• 2 Apps have been sold or transferred to Munkfun (possible typo; MunkyFun)</li> <li>• 2 Apps have been sold or transferred to The Walt Disney Company</li> </ul> <p>D. Respondent stated that Zynga still manages the Apps sold or transferred to The Walt Disney Company.</p> <p>E. For apps that are deleted or no longer active, has all associated data with them been deleted? If not, why not?</p> <ul style="list-style-type: none"> <li>• "Yes" to all, except N/A for two (2) that are inactive.</li> </ul> <p>F. For apps that are active, has all data that is not used to meaningfully improve the users experience within the app been deleted (e.g., friend data)? If not, why not?</p> <ul style="list-style-type: none"> <li>• "Yes" to all, three (3) apps had a blank answer, two (2) had "n/a App deleted" as explanations; the remaining one did not have an answer.</li> </ul>
<b>Analysis:</b>	<p>The ADI Team identified 44,386 total apps associated with Zynga.<sup>10</sup> Of the 292 apps disclosed by the respondent, the ADI Team was able to identify 263 unique apps in Facebook's data. 25 of the 292 apps were reviewed by ADI and the remaining 238 were not reviewed by the ADI Team. Although it is possible some of the apps identified by the ADI Team were false positives in the population, the ADI Team recommends that counsel inquire about the large discrepancy of apps and recommends following up with the respondent.</p>
<b>Potential Follow-Up Question(s):</b>	<p>Please see below for a list of some of the apps created by Zynga and please respond to the following questions:</p> <ol style="list-style-type: none"> <li>a. What are the functions of this app?</li> <li>b. Is this app associated with any other companies? If so, please identify the companies associated with each app.</li> <li>c. To the best of your knowledge, has this app been sold or transferred to another party?</li> </ol>

<sup>10</sup> Determined by identifying apps related to the Zynga entity on app domain, owned business ID, business name, developer email domain, contact or alt email domain. Given the scope of Zynga on the Platform, it is possible that there are some false positives in the population (e.g., a developer did not change his e-mail address after moving to a new company). Similarly, it is possible some Zynga apps are not included in the population if the app was not tagged with a domain affiliated with the entity.

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- d. Do you continue to manage this app?  
e. For apps that are deleted or no longer active, has all associated data with them been deleted? If not, why not?  
f. For apps that are active, has all data that is not used to meaningfully improve the users experience within the app been deleted (e.g., friend data)? If not, why not?

<i><b>App Name</b></i>	<i><b>App ID</b></i>
FishVille	151044809337
YoWorld	21526880407
PetVille	163576248142
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FrontierVille	201278444497
Fashion Wars	39183588571
Pirates: Rule the Caribbean!	16421175101
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#### Question 2:

<b>Question Text:</b>	<p>Please provide a list of permissions requested before May 2015 for all apps associated with Zynga that were developed on, or prior to, Graph API v1.0, including all user and friends' permissions. For each permission, explain:</p> <ol style="list-style-type: none"> <li>Why was this permission requested?</li> <li>Was this data collected?</li> <li>How did you utilize this data?</li> <li>Where was and is that data stored?</li> <li>Who has access to this data?</li> </ol>
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	<p>f. Was the data ever shared with, made accessible to, or sold to – whether in raw, aggregated or anonymized form – any third parties or affiliates? If so, please list all such data and the third parties with whom such data was shared. Also, please specify any data transfer policies or data retention policies that you have for these parties, or that you impose on these parties.</p> <p>g. Has this data ever been deleted in whole or in part? If yes, please explain the circumstances and what steps did you take to delete the data? If not, why not?</p>		
<b>Response:</b>	<p>A full history of premissions requested is unavailable, but any premissions requested should have been within the scope of the data being collected from our players as described within our Privacy Policy.</p> <p>a. For the purposes of personalizing and optimizing our games as well as maintaining any age restrictions in place at the time</p> <p>b. False (No)</p> <p>c. For the purposes of personalizing and optimizing our games as well as maintaining any age restrictions in place at the time</p> <p>d. On Zynga operated servers</p> <p>e. Data that was made public by Facebook (such as first name, profile pic) were also made visible to the players of our games if there was an in-game interaction involving a particular player. Non public data was generally confined to access only within Zynga</p> <p>f. Not that Jessup knows of, but there were situations where we shared facebook ids back with Facebook.</p> <p>g. False (Yes). False (No). For data collected for games that are sunset prior to 2019, the data should have been deleted as a part of our normal sunset process.</p>		
<b>Analysis:</b>	<p>Respondent did not address the question at hand and stated that they do not have a history of permissions requested by the app. Respondent states in response to Question #2b. that no Facebook data associated with the permissions requested under v1.0 was collected. However, in response to Questions #2d. and 2e, the respondent states that the data is stored on Zynga-operated servers and starts a sentence with, "For data collected . . .," clearly indicating that Facebook data was collected.</p> <p>As the full history appears to be unavailable or the respondent will not provide it, FTI recommends that counsel request all documentation related to the collection of Facebook data.</p>		
<b>Potential Follow-Up Question(s):</b>	<p>Thank you for your response to RFI Question #2. We understand a full history of permissions collected is not available; however, to the best of your ability, please provide a list of permissions requested before May 2015, including all user and friends' permissions for the apps listed below.</p> <table border="1" data-bbox="858 1342 1463 1379"> <thead> <tr> <th>App Name</th><th>App ID</th></tr> </thead> </table>	App Name	App ID
App Name	App ID		

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		FarmVille	102452128776	
		Texas HoldEm Poker	2389801228	
		Mafia Wars	10979261223	
		Café World	101539264719	
		Pioneer Trail	266989143414	
		Scramble	6494671374	

Question 3:															
<b>Question Text:</b>	In the course of analyzing your data requests for data obtained from Facebook, we observed you used the fql:query and gr:get:multi methods at various times. Please explain in detail what data fields were gathered using those methods.														
<b>Response:</b>	A full history of fql queries is unavailable, but any queries run should have been within the scope of the data being collected from our players as described within our Privacy Policy.														
<b>Analysis:</b>	Responded did not provide responses for the question; rather, they state that they do not have a full history of fql queries and that all data was collected from players as described within their privacy policy. While their privacy policy states that Zynga collects Facebook data and shares data with third parties, it is unclear if Facebook data is shared. As the response does not answer what was gathered from fql and other bulk methods, FTI recommends asking the question again and having the respondent share <i>any</i> history of data.														
<b>Potential Follow-Up Question(s):</b>	<p>Thank you for your response to RFI Question #3. We understand a full history of fql queries and gr:get:multi methods may not be available. Please provide all documentation associated with the app's connection to Facebook's API and collection of data prior to May 2015.</p> <table> <tr> <th>App Name</th><th>App ID</th></tr> <tr> <td>FarmVille</td><td>102452128776</td></tr> <tr> <td>Texas HoldEm Poker</td><td>2389801228</td></tr> <tr> <td>Mafia Wars</td><td>10979261223</td></tr> <tr> <td>Café World</td><td>101539264719</td></tr> <tr> <td>Pioneer Trail</td><td>266989143414</td></tr> <tr> <td>Scramble</td><td>6494671374</td></tr> </table>	App Name	App ID	FarmVille	102452128776	Texas HoldEm Poker	2389801228	Mafia Wars	10979261223	Café World	101539264719	Pioneer Trail	266989143414	Scramble	6494671374
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Question 4:	
<b>Question Text:</b>	Identify and provide copies of all privacy policies that are or have been applicable to data handling practices for apps you developed operating on Facebook from the apps' initial release to present day. Please state how each of these policies were made available to users.
<b>Response:</b>	Each version was published online and available via www.Zynga.com. This was also available in-game via the TOS/PP acceptance flow, and available in the Settings menu.  This is a binder of our Privacy Policies from 2009 to present <a href="https://drive.google.com/file/d/1caRbCqTTsWOTbHH-e-OuCwTbwAWmOwcM/view?usp=sharing">https://drive.google.com/file/d/1caRbCqTTsWOTbHH-e-OuCwTbwAWmOwcM/view?usp=sharing</a>
<b>Analysis:</b>	The ADI Team identified privacy policies dating back to 2013 in three iterations. The most current policy became effective May 21, 2018. All three versions explicitly state that Zynga collects users' Facebook data, including user name and ID, profile picture, location, and activity information related to use of the app, which may be linked to publicly available friend data. <ul style="list-style-type: none"> <li>• All three versions state that Zynga does not knowingly collect personal information for children under the age of 13.</li> <li>• All three versions state that Zynga shares its data with third parties; however, none of the versions specify whether Facebook data is shared.</li> <li>• None of the three versions enumerate the types of user data that is expressly not shared with third parties.</li> </ul>
<b>Potential Follow-Up Question(s):</b>	None.

Question 5:	
<b>Question Text:</b>	Have you deleted data for all inactive users, including for any apps that are not active or no longer have an active user base? If yes, what steps did you take to delete the data? If not, why not?
<b>Response:</b>	Our policy is to delete and/or anonymize all data, including Facebook data, for all apps as part of our normal game sunset process. The data anonymization removes all PII and external IDs and only leaves behind data that cannot be tied back to Facebook accounts. This process has been completed for all games sunset prior to 2019.
<b>Analysis:</b>	The respondent stated that Zynga's policy is to delete and/or anonymize all data (including Facebook data) as part of its "normal game sunset process."

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	<p>Zynga's current privacy policies allow a user to request deletion and that: "For deletion requests, we will take reasonable measures to delete your personal information from our records. If you have sent content through or posted content on the Service, we may not be able to delete it. We will keep certain records (e.g., personal information relating to payments or customer service matters) where we need (and have rights) to, such as for legal or accounting purposes. We'll also keep information in order to exercise, defend, or establish our rights."</p> <p>The ADI Team recommends counsel consider consulting with the client regarding Zynga's practices of retaining anonymized Facebook user data following deactivation of its apps, as well as retaining personal information "in order to exercise, defend, or establish our rights." Aside from potential concerns relating to these two practices, based on the respondent's answer to this question, the ADI Team does not recommend further follow-up on this topic.</p>
<b>Potential Follow-Up Question(s):</b>	None.

Question 6:	
<b>Question Text:</b>	Please explain how users were notified that they were providing information to your apps and how they consented to providing such information. Identify the languages that you used in providing such notice and provide copies of the notifications used.
<b>Response:</b>	Players were informed via whatever app installation or permissions granting flows were in place by Facebook. Additionally, our Privacy Policy informs our players of the sorts of data we collect from our players.
<b>Analysis:</b>	Question and response included for reference only.
<b>Potential Follow-Up Question(s):</b>	None.

#### Question 7:

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<b>Question Text:</b>	Identify companies, including tech and service providers, with whom you partner for app development. Describe the nature of these partnerships and who stores the data obtained from Facebook. Do you maintain service level agreements with these partners that address the collection and storage of data obtained from Facebook? If so, please provide copies of those agreements.
<b>Response:</b>	PENDING RESPONSE - Is this limited to Player Data access only?
<b>Analysis:</b>	Respondent did not provide an answer to RFI Question #7. The ADI Team recommends ensuring the respondent answers this question.
<b>Potential Follow-Up Question(s):</b>	Identify companies, including tech and service providers, with whom you partner for app development. Describe the nature of these partnerships and who stores the data obtained from Facebook. Do you maintain service level agreements with these partners that address the collection and storage of data obtained from Facebook? If so, please provide copies of those agreements.

Question 8:	
<b>Question Text:</b>	Have you or your partners sold, licensed, or monetized data obtained from Facebook, including but not limited to aggregated data, insights, derived data, or data models built using data collected from Facebook?
<b>Response:</b>	No, not that we are aware of.
<b>Analysis:</b>	Question and response included for reference only.
<b>Potential Follow-Up Question(s):</b>	None.

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